

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

CRIMINAL #04-10288-RWZ

UNITED STATES

v.

JOSEPH ALLEN

DEFENDANT'S MOTION TO MODIFY CONDITIONS OF RELEASE

Joseph Allen, the defendant in the above-captioned criminal case, hereby moves this Court to modify his conditions of release by permitting him to attend Thanksgiving Dinner at the home of his girlfriend's grandmother, Rosalie Cazallarin, at 7 Angle St. in Gloucester from 9:00 a.m. until 2:00 p.m. on Thursday, November 25, 2004. The government has informed undersigned counsel that it has no objection to the allowance of this motion. Pretrial Services have informed undersigned counsel that Mr. Allen is in full compliance with his conditions of release and that they have no objection to the allowance of this motion.

Respectfully submitted,

JOSEPH ALLEN

By his attorney,



James L. Sultan, BB0 #488400
Rankin & Sultan
1 Commercial Wharf North
Boston, MA 02110
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CERTIFICATE OF SERVICE

I hereby certify that I have served the foregoing document upon the government by mailing a copy thereof, to AUSA David Tobin, Moakley Federal Courthouse, One Courthouse Way, Suite #9200, Boston, MA 02210 and US Pretrial Services Officer Christopher Wylie, Moakley Federal Courthouse, One Courthouse Way, Suite #1300, Boston, MA 02210 on November 19, 2004.

A handwritten signature in black ink, appearing to read 'JL Sultan', is written over a horizontal line.

James L. Sultan